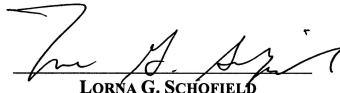


PIERCE BAINBRIDGE

John Pierce
Partner
355 S. Grand Avenue, 44th Floor
Los Angeles, CA 90071
jpierce@piercebainbridge.com

VIA ECF


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

July 28, 2020

The Honorable Lorna G. Schofield
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Application DENIED. The Court does not typically adjourn the initial pretrial conference pending a response to pleadings. The parties are reminded that the joint conference materials are due seven days before the conference, or by **July 30, 2020**.

Dated: July 29, 2020
New York, New York

Re: Solid 21, Inc. v. Richemont North America, Inc. et al., Case No. 1:19-cv-01262

Dear Judge Schofield,

I represent Plaintiff Solid 21, Inc. in the above-referenced matter. I write on behalf of both parties to request an adjournment of the initial case management conference currently scheduled for August 6, 2020 at 10:50 a.m.

As the Court is aware, the Court recently ruled on Defendants' motion to dismiss (ECF No. 91), granting it in part and denying it in part. Subsequently, on July 13, 2020, Defendants filed an Answer and Counterclaims in response to Plaintiff's Third Amended Complaint. (ECF No. 98.) The current deadline for Plaintiff to respond to the Counterclaim is August 3, 2020—three days before the currently scheduled initial case management conference. In light of the fact that not all of the initial pleadings have been filed yet, the parties respectfully request that the Court adjourn the conference to after August 13, 2020, or a date that is convenient for the Court.

The parties have sought to adjourn this conference once before (*see* ECF No. 95), which the Court granted (*see* ECF No. 96). Counsel for Plaintiff and Defendants consent to this request.

Respectfully submitted,

/s/John Pierce
John Pierce

cc: All counsel of record (via ECF)

Pierce Bainbridge P.C.